

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

LaKrystal Coats, as Personal )  
Representative of the Estate of ) C/A: 1:17-cv-02930-TLW  
Demetric Cowan, )  
) )  
Plaintiff, ) **PROPOSED VOIR DIRE**  
) **ON BEHALF OF PLAINTIFF,**  
v. ) **LAKRYSTAL COATS**  
) )  
Sidney Montgomery, *in his individual* )  
capacity; Roy Murray, *in his individual* )  
capacity; and Pamela Osborne, *in her* )  
*individual capacity,* )  
) )  
Defendants. )  
)

Respectfully, undersigned counsel, on behalf of Plaintiff, Ms. LaKrystal Coats, asks this Court to inquire of the jury venire the following questions:

1. Some people believe there has been an increase in cases that really do not belong in court. Other people say it just looks that way because of the way the situation is presented in the news. Do you think there are too many lawsuits that are filed?
2. Do you think there are too many “frivolous” lawsuits filed?
3. Do you understand that we all have the right to let a jury decide the merit of a case like this one?
4. Is there any member of the jury panel who has worked for a municipal or government entity?
5. Do you think there are cases where large amounts of money damages are justified? Why or why not? In what types of cases might a large amount of money be justified?
6. Do you believe that the size of jury awards affects insurance premiums?
7. Do you believe that the size of jury awards affects community services?

8. Is there a drug problem in your neighborhood or community?
9. Some people believe that drug addiction is a sickness. Other people feel that it shows a lack of discipline. How do you feel?
10. Do you think that someone who is experiencing a drug overdose is entitled to medical assistance?
11. Have you or a member of your family ever needed medical assistance? And have you, or any member of your family, ever needed to rely on others for that assistance?
12. Do you believe that inmates at detention facilities are entitled to medical assistance?
13. Have you, or do you know anyone who has, been employed as a law enforcement or correctional officer for any federal, state, local agency, or correctional facility?
14. Do you have friends who are law enforcement or corrections officers?
15. Have you ever been inside a jail or prison?
16. Do you believe law enforcement officers, including corrections officers or prison guards, are more trustworthy than other people? Should they be given the benefit of the doubt if their conduct is challenged?
17. Do you believe inmates at detention facilities are less trustworthy than other people? Would the fact that the decedent in this case was in pre-trial detention make you less likely to render a verdict for the plaintiff?

Respectfully submitted,

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